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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Establishment of Public Service Radio)	RM-9405
Pool in the Private Mobile Frequencies)	
Below 800 Mhz)	

COMMENTS OF HOUSTON LIGHTING & POWER COMPANY

Pursuant to Section 1.405 of the FCC's Rules, Houston Lighting & Power Company (HL&P) hereby submits its Comments in support of the above-referenced "Petition for Rulemaking" filed on August 14, 1998, by UTC, The Telecommunications Association (UTC), the American Petroleum Institute (API), and the Association of American Railroads (AAR).

Introduction

HL&P is an investor owned utility serving over 1.6 million electric customers within an approximate 50 mile radius of Houston, Texas. HL&P currently holds over 150 FCC licenses for frequencies ranging from 2 mhz to 23 ghz. These licenses and frequencies are critical to our ability to serve our customers, restore service during emergencies and continue to provide a safe work environment for our employees.

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Comments

The supplying of electric energy is vital to the Houston area economy and safety of the general public and requires sophisticated wireless communications. Every year the Houston area is subjected to various types of storms, be they hurricanes, tornadoes, floods, and occasionally even freak winter ice storms that cause massive power outages. It is during these times that HL&P realizes the true value of our wireless communications and our allocated frequency spectrum. The restoration efforts involve hundreds of utility crews from HL&P and our neighboring utilities that come to our aid. Although we have extensive radio communications systems, they are greatly overloaded during these emergencies, and our neighboring utilities bring in additional radio systems to supplement HL&P's systems. Public systems such as cellular and paging are generally unavailable during the first several days of these emergencies. Primary communications to field crews is through our privately owned radio networks. Thousands of homes are usually without electricity and restoration of critical homes and businesses are dependent on our ability to dispatch crews using these private internal wireless systems.

It is obvious that any interference from close space co-users on our frequency spectrum allocations would cause complete chaos and potentially result in delays in getting electricity to the general public, and endanger the safety of the restoration crews. It is crucial to public safety that power be restored expeditiously during these types of emergencies. Critical dispatch communications for grounding and power line energizing relies solely on our ability to communicate in an interference free environment. Any interference will cause unnecessary delays in transmitting field orders. Utility communications must be clear and concise to insure the safety of our employees and the public.

In the few months of competitive frequency coordination on shared utility frequencies interference has been apparent in several area of the country during emergencies, and has already diluted the importance of this utility spectrum. Business channels have become increasingly congested and while this can be construed as nuisance interference to those users, it is harmful interference when this type of congestion occurs on our frequency allocations. There is no way of predicting when channel priority should take place in a shared system. At any given moment, utility crews may need positive and clear communications, free from interference from other users. During any power outage there is suddenly a real danger to the general public and our crews. This type of emergency requires immediate response and concise dispatch orders. There can be no waiting until the channel is clear of routine non-utility communications.

It is apparent that the Petition for Rulemaking proposing a Public Service Radio Service insures the continued safety of the general public in allowing utilities a means to communicate in an interference free environment. Anything short of this compromises the safety of thousands of utility company employees, the general public and increases the potential of extended utility outages of electric energy.

Conclusion

In conclusion, Houston Lighting & Power supports the Petition for Rulemaking, and urges the FCC to promptly issue a Notice of Proposed Rulemaking looking toward the creation of a Public Service Radio Service as described in the Petition.

Respectfully submitted,

HOUSTON LIGHTING & POWER COMPANY

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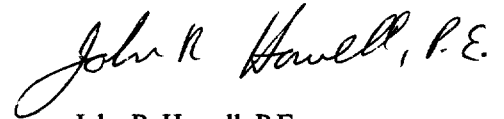
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Comments of Houston Lighting & Power Company" was sent by first-class mail, postage prepaid, to the following persons this 14th day of December, 1998.

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